REMARKS

I. Introduction

Claims 1-43 have been examined and are rejected. Specifically, claims 1-6, 14-25 and 33-37 are rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over U.S. Patent No. 6,078,926 to Jensen et al. (hereinafter "Jensen") in view of U.S. Patent No. 6,732,331 to Alexander (hereinafter "Alexander"); claims 7-13 and 26-32 are rejected under 35 U.S.C. § 102(b) as allegedly being anticipated by U.S. Patent No. 5,913,205 to Jain et al. (hereinafter "Jain"); and claims 38-43 are rejected under 35 U.S.C. § 102(b) as allegedly being anticipated by Jensen.

II. Claim Rejections—35 U.S.C. § 102(b)

A. Claims 7-13 and 26-32

As noted above, claims 7-13 and 26-32 stand rejected under § 102(b) as allegedly being anticipated by Jain.

As an initial matter, claim 7 is amended to incorporate the features of claim 8 therein. Claim 26 is similarly amended to incorporate the features of claim 27 therein. Claims 8 and 27 are canceled to avoid redundancy. Thus, as amended, claim 7 is directed to a method of representing a multimedia content management object in a database comprising a high level content model and a low level physical model of multimedia content data, said low level physical model providing a mapping to a data engine, the method comprising "entering multimedia content data metadata and schema in the low level physical model" and "mapping the metadata

and schema to the data engine," "wherein the low level physical model supports a plurality of high level content models."

The Examiner's position is that Jain discloses the features of claim 8 and 27, which are incorporated into claims 7 and 26, respectively, by describing a low level physical database model that supports high level content models in vertical applications such as environmental imaging, medical and multimedia (*see* Office Action: page 7). Applicants respectfully disagree.

Jain relates to image analysis and comparison. In Jain, representations of the features of an image may include characteristics such as local intensity histograms, edge histograms, region-based moments, spectral characteristics, etc. (Jain: col. 3, lines 17-23). These representations are stored in a database as structured data (*Id.*). The mere use of metadata to represent image features, as disclosed in Jain, does not disclose or suggest the features of entering multimedia content data metadata and schema in a low level physical model and mapping the metadata and schema to a data engine, let alone that the low level physical model supports a plurality of high level content models.

Instead, in Jain, primitives are defined to allow the system to operate on visual objects across a variety of applications (Jain: Abstract; col. 12, lines 1-19; col. 16, lines 40-43; and col. 27, lines 19-25). These primitives correspond to image features (*see* Jain: col. 7, line 59 to col. 8, line 4), and are not a low level physical database model supporting a plurality of high level content models.

Accordingly, claim 7 is not anticipated by Jain. Claim 26 recites features similar to those in claim 7 and, thus, is not anticipated by Jain based on a rationale analogous to that set forth

above for claim 7. Consequently, claims 9-13 and 28-32 are not anticipated by Jain, at least by virtue of their dependency.

B. Claims 38-43

As noted above, claims 38-43 stand rejected under § 102(b) as allegedly being anticipated by Jensen.

Claim 38 is directed to a method of populating a multimedia content management system with content schema and metadata, the method comprising, *inter alia*, "associating each component of the content item with a row in a separate relational database table." The Examiner's position is that Jensen discloses these features of claim 38 by describing an object to relational mapping that identifies a relational database row as corresponding to a new object and relational table columns mapping into attributes (*see* Office Action: page 9). Applicants respectfully disagree.

Jensen relates to a method for transforming data from a traditional relational database schema into an object-relational schema. In Jensen, the results of a complex relational-database query (*e.g.*, operating on two tables in the relational database) is transformed into a network of heterogeneous objects (Jensen: col. 7, lines 42-45). These objects (*e.g.*, A1, A2, A3, B1, B2, B3 and B4 in Fig. 3) are stored in an object-oriented data structure 104. Neither the individual objects nor the resulting object-oriented data structure corresponds to each component of a content item being associated with a row in a separate relational database table.

In Jensen, tables (*e.g.*, TABLE A 103, TABLE B 105 and results table Q1 107) are all tables with multiple rows, wherein individual rows of the tables may be mapped into discrete

objects (*e.g.*, A1, A2, A3, B1, B2, B3 and B4). These tables, however, do not correspond to each component of a content item being associated with a row in a separate relational database table. For example, according to claim 38, if a content items has five components, then each of the five components would be associated with a row in a separate relational database table, which would require five separate tables. Jensen simply does not disclose or suggest such a feature.

Accordingly, Jensen does not disclose, and cannot possibly suggest, that each component of a content item is associated with a row in a separate relational database table and that attributes of the content item are associated with corresponding columns of the relational database tables. Therefore, claim 38 is not anticipated by Jensen. Consequently, claims 39-43 are not anticipated by Jensen, at least by virtue of their dependency.

III. Claim Rejections – 35 U.S.C. § 103(a)

As noted above, claims 1-6, 14-25 and 33-37 stand rejected under § 103(a) as allegedly being unpatentable over Jensen in view of Alexander.

As an initial matter, claim 1 is amended to further clarify that the item (corresponding to the multimedia content management object), which is defined by the relational database tables, is used to construct a plurality of high level content management data models, each of which corresponds to a different application. Claims 14, 20 and 33 are similarly amended.

It is respectfully submitted that Jensen and Alexander (alone or in combination) fail to teach or suggest these features of claim 1. The Examiner acknowledges that Jensen fails to teach or suggest using an item defined by relational database tables to construct a plurality of high level content management data models. Accordingly, Jensen cannot teach or suggest "using the

item defined by the relational database tables to construct a plurality of high level content management data models, each corresponding to a different application," as recited in claim 1.

Furthermore, Alexander fails to cure this deficiency of Jensen. In Alexander, a content management framework 18, which operates at a metadata level, enables a user to manage the arrangement, composition and display attributes of web page content as maintained in a data store (Alexander: col. 4, lines 37-49). The content management framework 18 generates metadata templates 100, which allow a user to control the format and content of a data entry form 130, which in turn can be used to generate a web page 160 (Alexander: col. 8, lines 7-15). Alexander, however, fails to teach or suggest any construction of a plurality of high level content management data models, each corresponding to a different application.

Accordingly, claim 1 is not rendered obvious by the proposed combination of Jensen in view of Alexander. Claims 14, 20 and 33 recite features similar to those found in claim 1 and, thus, are patentable over the proposed combination of Jensen in view of Alexander based on a rationale analogous to that set forth above for claim 1. Consequently, claims 2-6, 14-19, 21-25 and 34-37 are patentable over the proposed combination of Jensen in view of Alexander, at least by virtue of their dependency.

IV. Conclusion

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly invited to contact the undersigned attorney at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

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